

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for)	WC Docket No. 09-197
Universal Service Support)	
)	
Connect America Fund)	WC Docket No. 10-90

COMMENTS OF SPRINT CORPORATION

Sprint Corporation (“Sprint”), pursuant to Public Notice DA 16-1144, hereby respectfully submits its comments in support of the petition for waiver filed by the United States Telecom Association (“USTelecom”) on October 3, 2016 in the above-captioned proceedings. In its petition, USTelecom has urged the Commission to waive Sections 54.400(j) and 54.409(a) of the rules to permit Lifeline providers to continue enrolling consumers in the federal Lifeline program based on state-specific program and income eligibility criteria in 27 jurisdictions. As USTelecom explained, there are many states that have Lifeline eligibility criteria that differ from those adopted in the *Lifeline Modernization Order*.¹ Differences between federal and state criteria “could potentially require providers to manage three different sets of Lifeline subscribers: those eligible for both federal and state discounts, those eligible for only the federal discount..., and those eligible for only the state discount....”² This will result in significant end user confusion and costly, complex implementation work-arounds by Lifeline service providers. To

¹ *Lifeline and Link Up Reform and Modernization et al*, 31 FCC Rcd 3962 (2016).

² Petition, p. 3.

avoid such outcomes, which are clearly contrary to the public interest, the Commission should grant USTelecom's petition for waiver.

Sprint's Assurance Wireless affiliate provides Lifeline service in 42 jurisdictions across the country. Until the National Verifier is operational, Assurance Wireless and other Lifeline service providers will continue to rely upon a multitude of state databases or applicant-provided documentation to make eligibility determinations. Revising these eligibility mechanisms to reflect the new federal eligibility requirements by December 2 is extremely daunting and would certainly be complex and costly. Providing service providers and state administrators with some additional but limited time to take whatever steps are necessary to align state and federal eligibility criteria will help to ensure compliance with federal rules, will help ensure that financially vulnerable end users continue to have access to critical Lifeline benefits, and will help control administrative program costs.

In another proceeding, Commissioner Pai stated that "[g]etting it right is far more important than getting it done right now...."³ His insights apply with equal force in the instant proceeding. To minimize the burden premature implementation of Sections 54.400(j) and 54.409(a) would have on affected stakeholders, USTelecom's petition should be granted.

³ See Statement of Commissioner Ajit Pai on Internet Governance, released Sept. 21, 2016.

Respectfully submitted,

SPRINT CORPORATION

/s/ Charles W. McKee

Charles W. McKee
Vice President, Government Affairs
Federal and State Regulatory

Norina T. Moy
Director, Government Affairs

900 Seventh St. NW, Suite 700
Washington, DC 20001
(703) 433-4503

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